

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

IN RE:

LEONARD CORA DIAZ

DEBTOR

CASE NO 23-00103 EAG

CHAPTER 13

**DEBTOR'S REPLY TO TRUSTEE'S OBJECTION TO CONFIRMATION  
DOCKET NO. 12**

TO THE HONORABLE COURT:

**COMES NOW, LEONARD CORA DIAZ**, the Debtor in the above captioned case, through the undersigned attorney, and very respectfully states and prays as follows:

**1.** The Chapter 13 Trustee filed a *Trustee's 341 Minutes and Objection to Confirmation*, Docket No. 12, whereby the Trustee objects the confirmation of the Debtor's proposed *Chapter 13 Plan*, Docket No. 4, in the above captioned case. The Trustee's objections are summarized as follows:

- the Debtor to provide evidence of being current in the DSO payments that become due post-petition from February, 2023;
- submit evidence of filing 2022 tax return;
- the Debtor to amend Schedule "C" since the Debtor is using a d1 exemption for an inheritance property and for a vacant lot of land;
- the L.V. is pending to be determined (TBD);
- the Debtor to provide appraisal and/or comparable for a vacant lot of land listed under Schedule A/B line 1.1;
- the Debtor to provide missing paystubs from December 2022 related to the Debtor's commissions; and
- the Debtor to verify amounts from income and commissions in SCMI and Schedule "I".

**2.** The Debtor hereby respectfully replies to the Trustee's objections as follows:

- on February 21, 2023, the Debtor submitted to the Trustee (uploaded to the Trustee's system) evidence of being current in the DSO payments, specifically, the Debtor provided to the Trustee a copy of the December/2022 and January, February/2023 DSO payments;
- the Debtor is pending to file his 2022 tax return with the Department of Treasury, the Debtor to provide to the Trustee a copy of said 2022 tax return within the next

30 days;

---on February 23, 2023, the Debtor filed a *Debtor's Amended Schedule C*, Docket No. 13, whereby the Debtor is claiming the correct exemptions for the Debtor's hereditary interest in a property he uses as his residence (d1) and for the Debtor's vacant lot of land (d5);

---as to the "market value" of the Debtor's lot of land listed under Schedule A/B item 1.1, the Debtor to provide to the Trustee, within the next 30 days, further information/documents to sustain the value given to said property;

---on February 16, 2023, the Debtor sent to the Trustee (uploaded to the Trustee's system) copy of missing commissions paystubs from December/2022; and

---on February 16, 2023 the Debtor filed a *Debtor's Amended Schedule I*, Docket No. 11 to clarify the Debtor's income and commissions as requested by the Trustee.

**3.** The Debtor hereby respectfully replies to the Trustee's objection to Plan confirmation (Docket No. 12), in the above captioned case.

**WHEREFORE**, the Debtor respectfully prays that the Trustee's objection to Plan confirmation, Docket No. 12, be denied, in the above captioned case.

**I HEREBY CERTIFY** that on this same date a copy of this notice was sent via electronically with the Clerk of the Court using CM/ECF systems which will send notifications of such to the Chapter 13 Trustee; and I also certify that I have mailed by United States Postal Service copy of this motion to the following CM/ECF non-participant: the Debtor, Leonard Cora Diaz, PO Box 1954 Las Piedras PR 00771, in the above captioned case.

**RESPECTFULLY SUBMITTED.** In San Juan, Puerto Rico, this 23<sup>rd</sup> day of February, 2023.

/s/Roberto Figueiroa Carrasquillo

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